

# EXHIBIT F

**Ezekiel Perez**

**From:** Austin Krist <akrist@clevelandterrazas.com>  
**Sent:** Wednesday, April 7, 2021 4:30 PM  
**To:** John Muller; wgermany@bsklaw.com; Ezekiel Perez  
**Cc:** Tim Cleveland  
**Subject:** Conference Regarding DMA's Motion for Attorneys' Fees

John and William,

DMA intends to file a motion for attorneys' fees later today in connection with the Court's ruling on the Harris SWD Agreement and DMA's related claims for breach of contract and declaratory relief, as well as Defendants' affirmative defenses to those claims.

I'm reaching out because the local bankruptcy rules require the parties to confer regarding claimed rates and hours. Could you please let us know whether you oppose (a) the claimed hourly rates, and (b) the claimed number of hours?

DMA is claiming the following reasonable rates and hours:

	Rate	Hours			Total \$
		Interpleader	Deposition*	Pretrial/Trial*	
Chris Johns	\$ 450	45	0	25.4	\$ 31,695
Christie Hebert	\$ 375	110	0	25.3	\$ 50,750
Tim Cleveland	\$ 450	0	14.7	56.5	\$ 32,040
Austin Krist	\$ 310	0	0.47	57.3	\$ 17,918
David Johns	\$ 100	2	0	8.7	\$ 1,067
CT Clerk	\$ 85	0	0	9.1	\$ 771
Natalie Wilson	\$ 375	11.6	0	0	\$ 4,350
Total Sum:					<u>\$ 138,590</u>
*These claimed hours constitute 1/3 of the total hours incurred. For example, Tim Cleveland spent 172 hours preparing for and trying this case, but DMA only claims 1/3 of those hours here (56.5 hours) in connection with the Harris SWD Agreement and Defendants' related affirmative defenses.					

Please let me know.

Best,

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